IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED SOVEREIGN AMERICANS, INC., BERNARD JOHNSON, and CITIZENS DEFENDING FREEDOM,	§ § § §	
Plaintiffs,	§ § §	
	§	No. 2:24-CV-00184-Z
v.	§ §	
JANE NELSON, *in her official capacity as Secretary of State of Texas*, KEN PAXTON, *in his official capacity as Attorney General of Texas*, and MERRICK GARLAND, *in his official capacity as Attorney General of the United States*,	§ § § § § §	
Defendants.	§	

THE TEXAS DEFENDANTS' MOTION TO DISMISS

Texas Secretary of State Jane Nelson and Texas Attorney General Ken Paxton (the "Texas Defendants") move to dismiss Plaintiffs' *Petition for Relief in the Form of a Writ of Mandamus* ("Complaint") under Federal Rules of Civil Procedure 12(b)(1) & (6). As further explained in the accompanying brief in support of this motion, Plaintiffs lack standing to invoke the Court's jurisdiction, cannot overcome the Texas Defendants' sovereign immunity, and otherwise fail to state any claim entitling them to relief. The Court should dismiss Plaintiffs' Complaint with prejudice.[1]

Dated: October 8, 2024   Respectfully submitted,
        Austin, Texas

KEN PAXTON   */s/ Cole P. Wilson*
Attorney General of Texas   **COLE P. WILSON**
                                                                Assistant Attorney General
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[1] Per N.D. Tex. L.R. 7.1.(a), counsel did not confer with opposing counsel prior to filing this motion.

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Certificate of Service

I certify that a copy of the document above was served on all counsel of record who have entered an appearance on October 8, 2024, using the Federal Court CM/ECF system.

/s/ Cole P. Wilson